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**From:** Gray, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=881C62B1E54142388C1DE2F8E3799C33-GRAY, DAVID]  
**Sent:** 3/22/2019 5:58:02 PM  
**To:** Drinkard, Andrea [Drinkard.Andrea@epa.gov]  
**CC:** Grantham, Nancy [Grantham.Nancy@epa.gov]; Thomas, Latosha [Thomas.Latosha@epa.gov]; Sauerhage, Maggie [Sauerhage.Maggie@epa.gov]  
**Subject:** RE: ITC Response Assistance

I don't at this moment. We have been notified of a potential breach in the secondary containment which could result in up to 40,000 gallons of material including PFFF being released with potential for entering the bayou. I am working on details.

David

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**From:** Drinkard, Andrea  
**Sent:** Friday, March 22, 2019 11:18 AM  
**To:** Gray, David <gray.david@epa.gov>  
**Cc:** Grantham, Nancy <Grantham.Nancy@epa.gov>; Thomas, Latosha <Thomas.Latosha@epa.gov>; Sauerhage, Maggie <Sauerhage.Maggie@epa.gov>  
**Subject:** RE: ITC Response Assistance

Do you know whether any of the water samples that could be posted as early as today include PFAS? Thanks.

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**From:** Gray, David  
**Sent:** Friday, March 22, 2019 11:51 AM  
**To:** Gillespie, Andrew <Gillespie.Andrew@epa.gov>; Orme-Zavaleta, Jennifer <Orme-Zavaleta.Jennifer@epa.gov>  
**Cc:** Forsgren, Lee <Forsgren.Lee@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>; Cook, Steven <cook.steven@epa.gov>; Idsal, Anne <idsal.anne@epa.gov>; Chancellor, Erin <chancellor.erin@epa.gov>; Drinkard, Andrea <Drinkard.Andrea@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>; Rodrick, Christian <rodrick.christian@epa.gov>; Wadlington, Christina <Wadlington.Christina@epa.gov>; Dennis, Allison <Dennis.Allison@epa.gov>; Kramer, Jessica L. <kramer.jessical@epa.gov>; Lyons, Troy <lyons.troy@epa.gov>; Mclain, Jennifer <Mclain.Jennifer@epa.gov>  
**Subject:** RE: ITC Response Assistance

ITC Fire Response Causes Toxic Contamination of Houston Ship Channel  
PFAS Firefighting Foam Highly Toxic to Human Health

Thursday, March 21, 2019

Contact:  
April Thomas, 206.321.3850, [april.thomas@sierraclub.org](mailto:april.thomas@sierraclub.org)

Houston, Texas -- The response to the #ITCFire petrochemical disaster has spawned a secondary toxic release. More than 130,000 gallons of toxic Class B fire fighting foams have been used to extinguish the chemical storage facility fire at the Intercontinental Terminal Company, combined with elevated levels of benzene that caused local authorities to issue a shelter-in-place order on Thursday.

PFAS-containing fire fighting foams have contaminated hundreds of waterways and drinking water systems across the U.S. The chemicals cannot be broken down, and persist indefinitely in the environment. Right now PFAS foams and other

contaminants from the fire response are running off into the Houston Ship Channel, with local toxicologists and fishers expressing concern for the health of communities and ecosystems connected to the Ship Channel.

PFAS foam is highly toxic to human health – both to emergency responders who apply the chemicals and to people who eat contaminated fish and shellfish or drink contaminated water. The ITC company has a long history of breaking environmental laws with illegal releases of contamination into the air and local waterways.

In response, Sierra Club Dirty Fuels Gulf Coast Organizer Bryan Parras issued the following statement:

“Sierra Club has issued recommendations for local and state governments to immediately contain the toxic run-off, test water samples for PFAS chemicals, and ensure pollution does not extend through the Ship Channel into the Bay. If these PFAS chemicals reach the Galveston Bay, they will contaminate fish stocks and sediments for centuries. Our health has already been compromised by this ongoing disaster; already more toxic chemicals have been released because of the ITC fire than were released in the second storm of pollution post-Hurricane Harvey. Now on top of that we’re learning that dangerous toxins are being released into our local waterways, toxins that can never be cleaned up once they are released.

“Who do our local elected officials represent? The people who elected them, or the polluters who are poisoning us?”

#### About the Sierra Club

The Sierra Club is America’s largest and most influential grassroots environmental organization, with more than 3.5 million members and supporters. In addition to protecting every person's right to get outdoors and access the healing power of nature, the Sierra Club works to promote clean energy, safeguard the health of our communities, protect wildlife, and preserve our remaining wild places through grassroots activism, public education, lobbying, and legal action. For more information, visit [www.sierraclub.org](http://www.sierraclub.org).

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**From:** Gray, David

**Sent:** Friday, March 22, 2019 8:53 AM

**To:** Gillespie, Andrew <[Gillespie.Andrew@epa.gov](mailto:Gillespie.Andrew@epa.gov)>; Orme-Zavaleta, Jennifer <[Orme-Zavaleta.Jennifer@epa.gov](mailto:Orme-Zavaleta.Jennifer@epa.gov)>

**Cc:** Forsgren, Lee <[Forsgren.Lee@epa.gov](mailto:Forsgren.Lee@epa.gov)>; Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Cook, Steven <[cook.steven@epa.gov](mailto:cook.steven@epa.gov)>; Idsal, Anne <[idsal.anne@epa.gov](mailto:idsal.anne@epa.gov)>; Chancellor, Erin <[chancellor.erin@epa.gov](mailto:chancellor.erin@epa.gov)>; Drinkard, Andrea <[Drinkard.Andrea@epa.gov](mailto:Drinkard.Andrea@epa.gov)>; Grantham, Nancy <[Grantham.Nancy@epa.gov](mailto:Grantham.Nancy@epa.gov)>; Rodrick, Christian <[rodrick.christian@epa.gov](mailto:rodrick.christian@epa.gov)>; Wadlington, Christina <[Wadlington.Christina@epa.gov](mailto:Wadlington.Christina@epa.gov)>; Dennis, Allison <[Dennis.Allison@epa.gov](mailto:Dennis.Allison@epa.gov)>; Kramer, Jessica L. <[kramer.jessical@epa.gov](mailto:kramer.jessical@epa.gov)>; Lyons, Troy <[lyons.troy@epa.gov](mailto:lyons.troy@epa.gov)>; Mclain, Jennifer <[Mclain.Jennifer@epa.gov](mailto:Mclain.Jennifer@epa.gov)>

**Subject:** RE: ITC Response Assistance

Thank you Andrew. I will pass that information along quickly.

Here is the latest for our efforts to collecting information about PFFF used in the response.

David

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**From:** Reid McLelland <[RMcLelland@iterm.com](mailto:RMcLelland@iterm.com)>

**Sent:** Friday, March 22, 2019 12:47 AM

**To:** spill12

**Cc:** Mike Gaudet; Mike Taylor

**Subject:** Foam

These are the foams that ITC ordered. Keep in mind this does not include foams that were brought to the site by CIMA responders, even though some of those may be the same as the ones attached. We will have to look at those totes when personnel can get into the area.

**Reid McLelland**

Environmental Compliance Specialist  
Intercontinental Terminals Co LLC  
1943 Independence Pkwy S. | LaPorte, TX 77571  
D: 281.884.0308  
C: 281.838.7567  
[rmclelland@iterm.com](mailto:rmclelland@iterm.com)

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**From:** Gillespie, Andrew

**Sent:** Friday, March 22, 2019 8:25 AM

**To:** Orme-Zavaleta, Jennifer <[Orme-Zavaleta.Jennifer@epa.gov](mailto:Orme-Zavaleta.Jennifer@epa.gov)>; Gray, David <[gray.david@epa.gov](mailto:gray.david@epa.gov)>

**Cc:** Forsgren, Lee <[Forsgren.Lee@epa.gov](mailto:Forsgren.Lee@epa.gov)>; Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Cook, Steven <[cook.steven@epa.gov](mailto:cook.steven@epa.gov)>; Idsal, Anne <[idsal.anne@epa.gov](mailto:idsal.anne@epa.gov)>; Chancellor, Erin <[chancellor.erin@epa.gov](mailto:chancellor.erin@epa.gov)>; Drinkard, Andrea <[Drinkard.Andrea@epa.gov](mailto:Drinkard.Andrea@epa.gov)>; Grantham, Nancy <[Grantham.Nancy@epa.gov](mailto:Grantham.Nancy@epa.gov)>; Rodrick, Christian <[rodrick.christian@epa.gov](mailto:rodrick.christian@epa.gov)>; Wadlington, Christina <[Wadlington.Christina@epa.gov](mailto:Wadlington.Christina@epa.gov)>; Dennis, Allison <[Dennis.Allison@epa.gov](mailto:Dennis.Allison@epa.gov)>; Kramer, Jessica L. <[kramer.jessical@epa.gov](mailto:kramer.jessical@epa.gov)>; Lyons, Troy <[lyons.troy@epa.gov](mailto:lyons.troy@epa.gov)>; McLain, Jennifer <[McLain.Jennifer@epa.gov](mailto:McLain.Jennifer@epa.gov)>

**Subject:** RE: ITC Response Assistance

Will be discussing this but I am taking the liberty of a quick reply all in the interest of timeliness. It is mentioned below that ITC, EPA and TCEQ are sampling for water. **Many of our usual sampling supplies and equipment contain PFAS, so it is critical to use PFAS-free materials in collecting samples – equipment, clothing, gloves, containers, etc. This is necessary to avoid cross contamination of samples intended to be analyzed for PFAS.**

My apologies if this is already well known to the sample-collectors; if it is not well known, then EPA can provide further guidance on PFAS sampling protocols.

Andrew J. R. Gillespie, Ph. D.  
Associate Director, US EPA/ORD/NERL  
ORD Executive Lead for PFAS R&D

Office 919 541 3655 Cell 614 330 2226

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**From:** Orme-Zavaleta, Jennifer

**Sent:** Thursday, March 21, 2019 6:52 PM

**To:** Gray, David <[gray.david@epa.gov](mailto:gray.david@epa.gov)>

**Cc:** Forsgren, Lee <[Forsgren.Lee@epa.gov](mailto:Forsgren.Lee@epa.gov)>; Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Cook, Steven <[cook.steven@epa.gov](mailto:cook.steven@epa.gov)>; Idsal, Anne <[idsal.anne@epa.gov](mailto:idsal.anne@epa.gov)>; Chancellor, Erin <[chancellor.erin@epa.gov](mailto:chancellor.erin@epa.gov)>; Drinkard, Andrea <[Drinkard.Andrea@epa.gov](mailto:Drinkard.Andrea@epa.gov)>; Grantham, Nancy <[Grantham.Nancy@epa.gov](mailto:Grantham.Nancy@epa.gov)>; Rodrick, Christian <[rodrick.christian@epa.gov](mailto:rodrick.christian@epa.gov)>; Wadlington, Christina <[Wadlington.Christina@epa.gov](mailto:Wadlington.Christina@epa.gov)>; Dennis, Allison <[Dennis.Allison@epa.gov](mailto:Dennis.Allison@epa.gov)>; Kramer, Jessica L. <[kramer.jessical@epa.gov](mailto:kramer.jessical@epa.gov)>; Lyons, Troy <[lyons.troy@epa.gov](mailto:lyons.troy@epa.gov)>; Gillespie, Andrew <[Gillespie.Andrew@epa.gov](mailto:Gillespie.Andrew@epa.gov)>

**Subject:** Re: ITC Response Assistance

David, we're on it. Andy Gillespie will be following up

Jennifer Orme-Zavaleta, PhD  
Principal Deputy Assistant Administrator for Science

Office of Research and Development  
US EPA  
Cell 919-699-1564  
DC 202-564-6620  
RTP 919-541-2283

On Mar 21, 2019, at 4:33 PM, Gray, David <[gray.david@epa.gov](mailto:gray.david@epa.gov)> wrote:

Good afternoon,

We need your assistance. We are continuing to make good strides in our response efforts at ITC in Deer Park, Texas. Attention is turning to the use of AFFF materials to extinguish the fire and their possible environmental impacts. While the fire is out, AFFF is being used vapor suppression. We will need some assistance with the related PFAS questions and guidance. OCIR is already hearing questions from hill and committee staff about the AFFF use. I expect more questions will be raised at upcoming hearings as well as an increase in media attention within a few days.

Here are a few of my initial thoughts -

- Region 6 is working to determine which foams have been used. So far, we have received two product sheets in response to our requests (attached). We could use help determining whether PFAS is in each of the foams that have been used.
- Suggestions on what questions need to be asked of responders or what information would be helpful to have on hand as we gather information about other foams.
- AFFF is suspected to have entered into Tucker Bayou as there have been reports of foam in the water. ITC, TCEQ and EPA are collecting water samples. Any advice from HQ on that sampling to help ensure we get the data we need using the appropriate methods.
- We could use communications support both to develop a holding statement and rapid-response to questions from the hill/press/public.
- Advice on cleanup considerations that we need ITC to conduct post emergency response. We are already being asked if the site could become a Superfund site due to AFFF use.

Thanks everyone.

David

<Thunder Storm SDS.PDF>

<SDS NMS420-Universal-Gold-13-AR-AFFF.PDF>